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ABSTRACT

This paper reports the findings of an evaluation of Project SEALL (Special Education at the Local Level), initiated by the New York Board of Education, a pilot program representing an alternative approach to the delivery of services for special education students in programs at the community school district level. Through administrative restructuring, the program allows for greater exercise of local control over special education. A section discussing the project's background details the roles of participating districts, superintendents, and principals, and project goals. Evaluation methodology (involving interviews with school personnel) and findings are presented in the second section. Strengths of the program are characterized as a sense of ownership at the district level, greater manageability of long-range planning, enhanced innovation, integration of staff and students in the school culture, greater collegiality, and greater exchange of resources. Weaknesses included lack of clarification of roles and functions, lack of district-wide needs assessment, limitations in inservice staff development, and limitations in concerted efforts to engage parents in schooling efforts. A section discussing reviews of the project by other agencies presents findings similar to those of this evaluation, concluding that the project is not yet fully developed. The final section presents conclusions and recommendations, including the need for more inservice training for staff, the need for additional personnel, the need for more resources, and the need for district wide plans for special education. (CB)

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LOCAL ADMINISTRATION

OF

SPECIAL EDUCATION

UNDER

PPOJECT SEALL

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July 14, 1986

LOCAL ADMINISTRATION of

SPECIAL EDUCATION UNDER

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Introduction

One out of every eight New York City public school children is labelled as having a handicapping condition and is enrolled in a special education program. As noted by the 1985 report of the Mayor's Commission on Special Education, for the majority of these students their education at the elementary and junior high school levels is isolated from and uncoordinated with that of their peers in general education. This is so largely because the administration of special education is separate and physically removed from the schools that these children attend.

Because the provision of educational services for children with handicapping conditions is centrally controlled by the Board of Education's Division of Special Education, community school superintendents and principals have no ownership or responsibility for special education programs. Essentially, the present system inhibits a commitment by local administrators to insure quality educational services for a large percentage of students who reside in their domain. The

existence of separate, parallel administrative structures, one for general education students and one for special education students, impedes the integration of all students into the cultural life of the school. Although great strides have been made in legally guaranteeing and protecting the right to a specialized education, the distance from the administrators to the students they serve may be too great. As stated by the Mayor's Commission, "the road from 110 Livingston Street to the community schools is simply too long."

To address some of these issues, Project SEALL (Special Education at the Local Level) was initiated by the Board of Education. This pilot program represents an alternate experimental approach to the delivery of services for special education students in programs at the community school district level. Through administrative restructuring, this program allows for greater exercise of local control over special education, although the Central Division of Special Education still retains ultimate responsibility for special education programs. Through Request for Proposals (RFPs), SEALL was initiated in districts 1, 18 and 20 in the 1984-85 school year. It was expanded to districts 2, 4, 14, 21, 27 and 30 in 1985-86 through additional RFPs. Because this is a pilot project with far-reaching implications for the delivery of services to students, SEALL has been reviewed by both internal and external agencies. The Public Education Association (PEA), whose mission includes the monitoring of public education policy, has conducted its own evaluation of the SEALL

project. This paper will report the findings of this review as well as reflect upon recommendations and conclusions concerning the continuation and expansion of the SEALL project.

SEALL - Background and Overview

As an approach which delegates greater administrative authority and responsibility for special education to community school districts, SEALL has its roots in the Harrison House project which was in effect in 5 districts in 1982-83. Three of the districts involved in Harrison House, 1, 18 and 27, are now SEALL districts. SEALL, like Harrison House, places programming aspects for special education at the initiative of each participating district upon submission of proposals in accordance with goals articulated by the Division of Special Education. Unlike its predecessor, however, the SEALL project purports to delineate the allocation of responsibilities between general and special education.

Under SEALL, participating districts and local administrators assume a number of new roles and responsibilities. Below is a list of some of them:

Participating Districts:

- -assume increased responsibility for students assigned to special education programs in their districts. Citywide programs remain under direct responsibility of Division of Special Education
- -responsible for maximum home zoning of special education students from their districts

-responsible for ensuring that appropriate space is allocated

-coordinate school and district level staff development activities

-provide support to building principals and other key regular education administrative personnel to increase their knowledge and skills in special education

-take part in all special education management information systems

-must include special education personnel in general educational professional meetings and workshops

-have jurisdiction over special education personnel lines; (however, budgetary resources remain within the Division of Special Education structure and are managed by the participating districts' business managers in consulation with the Division of Special Education)

Superintendents:

-are administratively responsible for the SBST's -- including the timely completion of evaluations and provision of counseling as a related service

-designate the DSSE

-rate and assume control of teacher trainers and counselors

-rate the DSSE and the Educational Evaluators

Principals:

-coordinate the delivery of educational services to special education students in their schools. This involves coordination of activities of both special education and general education pupils with a focus on all students' achievement; they should encourage dialogue among special education and general education staff and provide a wide range of educational opportunities for all students

-rate school-assigned special education staff (except SBST staff) in consultation with the assigned special education field supervisors

To implement SEALL, participating districts received two new personnel, a District Supervisor of Special Education (DSSE) and an additional Field Supervisor regardless of the size of each district. The DSSE is responsible for overseeing the daily operations of special education

within the district except for citywide programs. In this capacity, (s)he is charged with facilitating both instructional programming and evaluation, through the School Based Support Teams (SBST), of special education students. Beyond these two personnel allocations, no other resources or services were singled out for the SEALL districts.

Five goals were articulated for the first year of the project. Following the first year evaluation process, two additional goals were stated. As noted, how these goals were addressed was based solely on the initiative of each district rather than through any stated plan from the Central Division. Following is a list of the seven goals:

1. Promote maximum effort to maintain students in general education.
2. Provide a wide range of mainstreaming opportunities.
3. Provide expanded career and prevocational instruction.
4. Encourage movement to the least restrictive environment, and return to general education when appropriate.
5. Provide improved quality instructional strategies and practices to special education students.
6. Increase the integration of general and special education students.
7. Increase the extent to which central initiatives are fully implemented and coordinated with other district initiatives.

As a pilot program, SEALL represents a desirable step toward shortening the road between administrative responsibility and special education students. However, careful objective analysis of the project is crucial

in order to insure that any new administrative model includes features which will create the most effective integrated program, without sacrificing handicapped children's special rights and individualized services. This is so because historic discrimination against the handicapped community and inattention by superintendents and principals over the years to the needs of special education students have created justifiable concern.

As a monitoring agent of public education policy, as well as a forthright proponent of the rights of handicapped individuals, PEA decided to conduct a comprehensive review of the SEALL project. Through field research, PEA investigated the impact of the administrative restructuring with regard to qualitative issues of service delivery to special education students. This research was analyzed in light of quantitative and qualitative issues raised by other reviewing agencies.

PEA Evaluation

To gather its data, PEA conducted face-to-face interviews with a number of school personnel. Two PEA consultants, Kevin J. Keane, Ph.D. and Ruth B. Sauer, were involved in the entire evaluation process. PEA concentrated its interviews in districts 1, 18 and 20 where SEALL has been in place for two years. In addition, interviews were conducted in district 4, a first year district. With permission from the Division of Special Education and introductions by the DSSE in each district, interviews were conducted with

principals, SBST members and site supervisors in May and June, 1986. The interview protocol focused on role changes, changes in the delivery of services to students, strengths and weaknesses of the SEALL project and suggestions for improving the process or rectifying problems. Interviews were conducted in each district both individually and in small groups, allowing for the opportunity to observe some school programs in session.

PEA Findings

All personnel who were interviewed willingly shared their experiences concerning the SEALL project, whether positive or negative. In fact, the interviews tended to run over the time alloted for each group or individual.

Comments by personnel interviewed in all districts centered on a number of perceived strengths and weaknesses of SEALL at both district and building levels:

Strengths:

District Level

-engenders a feeling of ownership which in turn creates a greater sense of responsibility and accountability for special education programs

Example: The strong leadership of the superintendents in each district was evident through directives and meetings with all administrative personnel promoting integration of special and general education programming.

-enables innovation in use of both personnel and resources

Example: All three districts visited reassigned guidance counselors throughout the districts so that both general and special education students could be served more effectively. In one school, group counseling involved both general and special education students.

-allows for greater manageability for long range planning

Example: One district has drafted a district-wide special education plan. In addition, site supervisors in another district trained SBST members in writing more appropriate instructional goals for Phase One IEP's.

-permits quality supervision of district personnel

Example: The DSSE has a direct line relationship with the superintendent and building principals as well as other special education personnel, allowing for closer monitoring of personnel within the district.

-promotes a more concerted effort to make the special education curriculum more compatible with that of general education

Example: The DSSE attends district-wide planning conferences on all phases of curriculum. In turn, some general education personnel attend special education planning conferences.

Building Level

-creates a feeling of ownership for special education students.

Example: All principals interviewed demonstrated spontaneous, enthusiastic support for SEALL in their schools. One principal stated that the special education students were "now school based rather than school housed." Also, some schools have initiated Pupil Personnel Teams.

-fosters integration of staff and students into the life and culture of the school

Example: In one school, the special education students are no longer identified to the school community by handicapping label. In all schools surveyed, special education and general education staff are invited to attend the same conferences.

-promotes greater collegiality

Example: Special education and general education personnel have more contacts both formally and informally which allows for more information sharing.

-allows for greater exchange of resources between general and special education

Example: Reassignment of school based special education personnel was possible when needed for prevention activities.

-permits closer scrutiny of special education instruction and personnel

Example: Principal manages and is responsible for the scheduling of all in-school special education personnel which allows for greater scheduling compatability with general education.

Weakneses:

District Level

-lack of clarification of roles and functions

Example: It was reported by clinical staff members that there is a need for a clearer definition of their relationship to both the DSSE and the Committee on the Handicapped (COH). Further, it was stated that SEALL relied too heavily on personality in order to function. For example, the role of the DSSE, as the daily manager of SEALL, appeared repeatedly to have new functions attached to it as issues arose in each district.

-lack of resources made available for the district to implement SEALL

Example: Reassignment of guidance counselors at times resulted in diminishing services to other populations. As noted, SEALL districts received no additional resources to implement initiatives.

-lack of district-wide needs assessment

Example: Although articulated as a need, needs assessment initiatives on the part of the districts were not evident.

-limitations in the systems of checks and balances with regard to the quality of services for children

Example: The only monitoring system in place at this time is that of the Jose P. monitoring from the Division of Special Education and yearly OEA evaluations.

-limitations in inservice staff development

Example: Although it was stated as a priority in the May, 1985 OEA report that general education personnel, especially principals, receive inservice training in special education, few initiatives were evidenced in the districts.

-limitations in concerted efforts to engage parents of special education students in their children's school life

Example: A large percentage of parents did not receive prior notice of the initiation of SEALL, nor was there evidence of long range planning to involve parents to a greater degree.

Building Level

-limitations in clarification of roles and functions

Example: Site supervisors in one district stated that their roles in the schools had become more limited because of a lack of clarification of their functions under SEALL.

-limitations in inservice staff development.

Example: Although preventive activities were evident, there was little, if any, sharing of approaches with all educational staff.

The concept of ownership along with a sense of responsibility for special education students and programs was the major theme expressed by all school personnel interviewed, even by those individuals who were critical of the SEALL project. Strong visible leadership by the superintendent as a proponent for the SEALL project in each district surveyed appeared to be a critical variable in integrating special education students into the life of the school. The principals interviewed appeared to have little difficulty accepting their roles and responsibilities under SEALL, although they did state that they relied heavily on the DSSE for advice and support. They also indicated that having a supervisory person like the DSSE at a district level was a decided asset because of his/her

greater degree of accessibility. The principals also stated that the willingness of the DSSE to engage him/herself in a variety of functions was valuable and helped promote a collegial relationship. Principals were critical of the lack of additional resources for inservice staff development, of time allotments for more prevention measures, and of materials.

A number of SBST members indicated that they felt more visible under SEALL and were used more frequently as a resource for general education staff with regard to problems or preventive issues at the school level. They did not feel that their autonomy was threatened under SEALL; rather that principals who pressured them prior to SEALL, for example with regard to removing problem students, continued to do so under SEALL, but some to a lesser degree than prior to SEALL. They indicated that there was some conflict in that more of their time was devoted to preventive issues, yet they were still under pressure from the Central Division in terms of productivity in evaluations. SBST members stated that it took time to come to terms with some of the role changes under SEALL. One individual indicated that if she had been interviewed at the end of the first year of implementaton, she would not have been so positive toward SEALL.

SBST members and principals stated that the reassignment of guidance counsellors greatly facilitated preventive measures, that guidance personnel were more available as resources, and that integration of

counselling for special and general education students when appropriate was an asset. A number of SBST members stated that problems arose regarding communication with the COH over students whose evaluations were questioned by the COH. They indicated that there was some confusion in terms of their roles and functions as they related to COH.

Issues concerning the clarity of roles and functions were most evident in interviews with the site supervisors. In one district, the lines of authority between principals and special education supervisors appeared to be in conflict, resulting in a role confusion for the site supervisors. However, in another district the supervisors were utilized in a variety of ways, including performing inservice workshops for SBST members on writing instructional goals for Phase I IEPs. It would appear that for some supervisors too much was left to initiatives and personalities rather than clearly defined roles and functions.

SEALL has been reviewed by other external and internal agencies. Before drawing conclusions and stating general recommendations, this report will summarize their findings so that they may be reflected in the concluding section.

Summary of Reviews by Other Agencies

Since its inception, three evaluations of SEALL have been made public. The Office of Educational Assessment (OEA) released evaluation reports in

May, 1985 and May, 1986 and the Coalition of Organizations and Advocates for Children (COACH) issued a report in May, 1986.

The first OEA evaluation (May, 1985), following implementation of SEALL in three districts for one year, did note that certain qualitative changes had occurred with the administrative restructuring. However, the report stated that a definitive conclusion concerning SEALL's value could not be reached. It did recommend continuance of the project, and made certain specific recommendations.

In the fall of 1985, OEA conducted another review of SEALL in all nine participating districts and issued the findings of this evaluation in May, 1986. The report stated that the most meaningful data on program impact were available only for second year SEALL districts. The six first-year districts had only received notification of acceptance of their RFPs in August, 1985; therefore, they were only in the initial stages of implementation when OEA was collecting its data.

OEA's findings indicated that SEALL achieved limited success when compared to non-SEALL districts in meeting the goals of the project. Following is a summary of its findings as they relate to SEALL goals:*

Goal: <u>Coordinate Programs that Provide Alternatives to Special Education/Mainstreaming Students in General Education</u>

-slight increase in direct support of "at-risk" students by SBSTs and guidance counsellors

*These are goals articulated in the 2nd year of implementation

-general education programs that provide alternatives to referral did not use special education staff resources
NOTE: At the end of the 1986 school year, PEA found some integration of special education staff with alternative programs.

Goal: Increase Integration of General and Special Education

-moderate increase in staff integration; somewhat lesser increase of student integration

Goal: Provide Expanded Career and Prevocational Instruction

-more district wide activity, more training, and increased adaptation of career education curriculum

Goal: Improve Instructional Strategies and Practices for Special Education Students

-instructional planning was better in second-year districts than non-SEALL districts

-provision of related services was better in second-year districts

-special education teachers increased their discussion of curriculum topics with general education teachers

Goal: Increase Mainstreaming Recommendations

-slightly higher in two of the second-year districts

Goal: Encourage Movement to the Least Restrictive Environment and Return To General Education

-rates of movement were low overall with no meaningful difference noted

The 1986 OEA report concluded that the SEALL model "has not been developed to its logical conclusion." Although certain qualitative changes were observed, the report states that the participating districts "have not gone far enough in carrying out the administrative reorganization." The report makes a series of recommendations, primarily concerning personnel issues, to strengthen the impact of the project in order more fully to integrate special and general education.

The May, 1986, COACH report addressed two issues regarding SEALL's administrative restructuring: the relationship of the COH chairperson and the DSSE, and the effect of SEALL's administrative structure on the evaluation and placement processes. A subcommittee of COACH interviewed the COH chairperson and DSSE in one second-year district, 20, and five first year districts, 2, 4, 21, 27, and 30.

Based on this work, the following problematic areas were noted:

-no formal communication process existed between the COH chair and the DSSE

-informal communication between the COH chair and the DSSE was impeded when they did not occupy the same building

-no design existed for the COH and SBSTs to contact one another directly

-SEALL districts were not in compliance regarding mandated referral, evaluation and placement timeliness*

-delays existed in bilingual evaluations

-redundancy existed in the keeping of logs and other paperwork

-the DSSEs as supervisors of the SBSTs lacked clinical training

In its conclusion, the COACH report "strongly recommends that the SEALL project not continue or be expanded to other districts as presently structured." Further, responding to rumors of the possibility that the COH might be placed under the community school district superintendent, the report stated that this must not occur.

*PEA, because of its concern over insuring the legal rights of special education students, conducted its own review of the Jose P. statistics for all districts between September, 1985 and January, 1986. It concluded that while compliance with mandated timelines was problematic for SEALL districts, it was no more so than for the non-SEALL districts. The SEALL project did not appear to negatively impact compliance issues.

PEA Conclusions and Recommendations

The SEALL project has had the opportunity to be reviewed by both internal and external agencies. To chart its future course, the findings of these agencies must be weighed and reflected in the decision-making process. If SEALL has been valuable, the importance of its contributions and feasibility of achieving them in this different mode must be delineated, but the weaknesses or limitations noted in the evaluations must also be addressed in concrete, realistic ways.

In its review of SEALL, PEA found a number of strengths in the project with crucial significance for the future of general and special education. The most pervasive and promising was the sense of ownership together with a sense of responsibility for special education students and programs articulated at both district and school levels. Since administrators set the tone and promote opportunities for an organization, their open, willing attitude is necessary for integration of special education students into the life of the school. Such integration has the potential for turning special education into a support system that helps schools and teachers adapt to the full range of needs and learning styles found in the student population rather than a discipline separate from the mainstream of education. In the view of PEA as well as an increasing number of educators and policymakers, this is the most useful direction in which special education can move.

However, the SEALL model needs substantial improvement to realize its promise over the long term and in other districts thoughout the city.

The OEA 1985 report cited the need for inservice training in special education, especially for principals with new responsibilities in this area. Absence of such professional development still appears to be a serious limitation, even in the second year districts. For example, the 1986 OEA report indicated that while the majority of principals supported mainstreaming in the abstract, they made few initiatives in this direction. This may be largely because of a lack of information, knowledge and/or strategies for approaching mainstreaming. Resources such as inservice staff development are necessary for all personnel who are involved or affected by the administrative restructuring entailed in this project.

Need for additional personnel also inhibits effective implementation of SEALL. In some instances, for example, it was noted that when guidance personnel were reassigned, general education students lost counseling services. Flexible use of personnel, however desirable, can not be a substitute for allocation of enough professionals. This is especially true of guidance personnel who have an overt, active role in preventive approaches.

The Division of Special Education has consciously functioned in a "laissez-faire" way with regard to the implementation of SEALL in the

districts. Although readily available when asked for assistance, the intention of the DSE has been to allow districts to take the initiative. Further, the DSE did not allocate extra resources other than the DSSE and an additional supervisor. It is questionable whether this stance is still appropriate if more effective implementation is to occur. It would appear that district-wide assessments of staff development and personnel needs would provide vital information to the DSE in making allocations for SEALL. Under SEALL the Division of Special Education still retains the "ultimate" authority over special education matters and must therefore also bear the responsibility of providing realistic resource allocations to the participating districts.

The DSE should take a more active role in addressing other weaknesses noted in the evaluations. Clearly defined roles, functions and lines of authority, as well as formal communication links among all special education administrative personnel can be facilitated by the central office. Further, to expand past a pilot stage, the DSE can offer technical assistance to districts in drafting district-wide Special Education Plans to replace the more loosely structured responses to the RFPs. Each plan could generate short and long term goals in light of the unique characteristics and needs of each district. Further, these plans could serve as the basis for continued monitoring to insure that quality services are maintained for special education students. In fact, one of the two-year districts, 20, initiated a Special Education Plan for its district; possibly this could serve as a model.

PEA makes the following recommendations.

Continuance of Project SEALL

The SEALL project should be continued in current districts and strengthened in the following ways:

-require district-wide plans for special education, including short-term and long-term goals, as the basis for program and parent involvement

-mandate and monitor district-wide needs assessments

-insure that the Division of Special Education take a more assertive role in providing technical assistance, allocating resources and monitoring services to special education students

-require districts to coordinate preventive services

-define more clearly the roles and functions of all administrative personnel under SEALL

-establish formal communication links between the DSSE and the COH chairperson

Expansion of Project SEALL

In order to expand the SEALL project to other districts, other variables must be taken into account. To participate in this project, districts were required to submit a proposal. This would indicate that the districts involved already had a degree of willingness to accept more responsibility for special education, since they were promised virtually no additional resources. Further, three of the nine participating SEALL districts were involved in the Harrison House project, where the groundwork for administrative restructuring was already in place. In addition, as noted, leadership, visibility and support of the Community School District superintendents was a critical variable in permitting the

SEALL project to be accepted and, therefore, succeed in each district. It is obvious that mandated participation would not promote the same atmosphere of acceptance unless something were done to elicit support.

PEA therefore recommends that the SEALL project be expanded by gradually phasing it into the remaining 23 districts subject to the following conditions and in accordance with the following plan:

- -five to six districts should be phased in each year over the next four years
- -priority should be given to districts which elect to be first and submit satisfactory district plans
- -the Division of Special Education should be funded and required to:
  - -provide background information and leadership training for administrators at all levels prior to assimilation of the SEALL model in newly involved districts
    (NOTE: Personnel from already existing SEALL districts could be utilized.)
  - -provide technical assistance in drafting the district-wide plans for special education
  - -develop and implement a comprehensive system for monitoring and intervening to assure that districts meet prescribed standards of due process, service and program quality
  - -allocate resources on an equitable basis reflecting district-wide needs assessments